

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

ROSY GIRON DE REYES, *et al.*,

Plaintiffs,

v.

WAPLES MOBILE HOME PARK
LIMITED PARTNERSHIP, *et al.*,

Defendants.

Civil No.: 1:16cv563-LO-TCB

JOINT MOTION TO SCHEDULE MOTIONS FOR HEARING

The parties, by counsel, jointly move this Court to hear Plaintiffs' Motion to Amend Exhibit List and Witness List ("Motion to Amend") (Dkt. 372) and Defendants' Motion *In Limine* to Exclude Evidence of the Ethnicity of Individuals at The Park Allegedly Affected by the Policy ("Motion in Limine") (Dkt. 322) on the same date—on July 16, 2021—with the same Judge because these motions are inextricably linked. In support thereof, the parties state as follows:

1. Defendants' Motion *in Limine* is set to be heard by the Court on July 16, 2021. (Dkt. 358.) Defendants' Motion *in Limine* argues that certain evidence regarding the ethnicity of individuals at Defendants' Park allegedly affected by the Policy should be excluded at trial. In opposing Defendants' Motion *in Limine*, Plaintiffs argue, *inter alia*, that they should be permitted to amend their exhibit list and witness list, and Plaintiffs reference their Motion to Amend, which was filed on the same date as their memorandum in opposition to Defendants' Motion *in Limine*. (See Dkt. 360.)

2. Accordingly, any hearing on Defendants' Motion *in Limine* and any hearing on Plaintiffs' Motion to Amend will necessarily involve a discussion of both motions and the same issues.

3. Moreover, a decision on Plaintiffs' Motion to Amend by the Court could affect a ruling by the Court on Defendants' Motion *in Limine*. Therefore, in order to conserve the parties' and the Court's resources, the parties respectfully request that the Court hear both motions at the same time and by the same Judge. To do otherwise, would require a duplicate discussion of the same issues and both motions and run the risk of potentially conflicting rulings on the issues presented in Defendants' Motion *in Limine*.

WHEREFORE, the parties respectfully request that Plaintiffs' Motion to Amend (Dkt. 372) be heard at the same time and by the same Judge who hears Defendants' Motion *in Limine* (Dkt. 322). Because the Court is already scheduled to hear Defendants' Motion *in Limine* on July 16, 2021 (*see* Dkt. 358), the parties respectfully request that the Court hear Plaintiffs' Motion to Amend at that time.

Dated: June 10, 2021

Respectfully submitted,

WAPLES MOBILE HOME PARK LIMITED
PARTNERSHIP, WAPLES PROJECT LIMITED
PARTNERSHIP AND
A. J. DWOSKIN & ASSOCIATES, INC.

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of June, 2021, I caused the foregoing to be filed electronically with the Clerk of the Court using CM/ECF, which will then send a notification of such filing to all counsel of record.

/s/

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